

DANIEL G. BOGDEN
United States Attorney
District of Nevada

MICHAEL A. HUMPHREYS
Assistant United States Attorney
333 Las Vegas Boulevard South, Suite 5000
Las Vegas, Nevada 89101
Telephone: 702-388-6336
Facsimile: 702-388-6787
Email: michael.humphreys@usdoj.gov

Attorneys for the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1975 GRUMMAN AMERICAN G-1159
AIRPLANE, SERIAL NO. 157
TAIL REGISTRATION NO. N468HW,

1969 GRUMMAN AMERICAN G-1159
AIRPLANE, SERIAL NO. 50
TAIL REGISTRATION NO. N650KA,

Defendants.

Case No. 2:14-CV-101-APG-(CWH)

**UNITED STATES' THIRD MOTION TO
EXTEND CAFRA DEADLINE TO FILE COMPLAINT**

The United States of America by and through Daniel G. Bogden, United States Attorney for the District of Nevada and Michael A. Humphreys, Assistant United States Attorney, respectfully moves this Court to grant a thirty day extension, or until April 21, 2014, to file its forfeiture complaint, *in rem* in the above-captioned action. The CAFRA deadline for the Government to file its complaint is currently March 21, 2014. This Court granted a second continuance on this matter thirty days ago.

1 For its grounds, the United States says that the undersigned Assistant United States Attorney
2 assigned to this case is still evaluating the case to determine the viability of filing a civil action. In
3 addition, counsel for the Government and counsel for the putative claimant have scheduled a face-to-
4 face meeting during the week of March 30, 2014, in an effort to resolve their differences in this case.
5 Since being assigned this case, Government counsel has reviewed hundreds of documents and has
6 spoken with experts and interested parties from two separate agencies: the DEA and the Federal
7 Aviation Administration. Government Counsel expects to complete its review of this matter within
8 the next thirty days and to make a decision about whether to file by then.

9 The undersigned has discussed this matter with Claimant's counsel, George Crow, and he has
10 given Government counsel consent to inform this Court that while he does not stipulate to this
11 continuance he will not oppose it.

12 WHEREFORE, the United States moves this Court to grant its motion to extend the time for
13 the United States to file its complaint in this matter for an additional thirty (30) days; or until April
14 21, 2014.

15 DATED this 21st day of March 2014.

16 Respectfully submitted,

17 DANIEL G. BOGDEN
18 United States Attorney

19 /s/Michael A. Humphreys
20 MICHAEL A. HUMPHREYS
21 Assistant United States Attorney

22 IT IS SO ORDERED:

23 
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: March 24, 2014
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